

1 STAN S. MALLISON (Bar No. 184191)
 StanM@TheMMLawFirm.com
 2 HECTOR R. MARTINEZ (Bar No. 206336)
 HectorM@TheMMLawFirm.com
 3 MARCO A. PALAU (Bar No. 242340)
 MPalau@TheMMLawFirm.com
 4 JOSEPH D. SUTTON (Bar No. 269951)
 JSutton@TheMMLawFirm.com
 5 MALLISON & MARTINEZ
 1939 Harrison Street, Suite 730
 6 Oakland, California 94612-3547
 Telephone: (510) 832-9999
 7 Facsimile: (510) 832-1101

8 **SHOOK, HARDY & BACON L.L.P.**
 William C. Martucci*
 9 wmartucci@shb.com
 Carrie A. McAtee*
 10 cmcatee@shb.com
 2555 Grand Blvd.
 11 Kansas City, Missouri 64108
 Telephone: 816-474-6550
 12 Facsimile: 816-421-5547

13 *admitted *pro hac vice*

14 Attorneys for Defendants
 Leggett & Platt, Incorporated
 15 and L&P Financial Services Co.

16 **UNITED STATES DISTRICT COURT**
 17 **EASTERN DISTRICT OF CALIFORNIA**

18
19 Case No. 2:15-cv-01911-JAM-EFB

20 EDGAR MORALES, SALVADOR MAGAÑA, AND
 MATTHEW BAGU on behalf of themselves, the State
 21 of California, and all other similarly situated
 individuals,

22 PLAINTIFFS,

23 v.

24 LEGGETT & PLATT INCORPORATED, a Missouri
 Corporation, L&P FINANCIAL SERVICES CO., a
 Delaware Corporation, and DOES 2-20, inclusive,

25
26 DEFENDANTS.
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**STIPULATION AND ORDER TO RE-
 SET CLASS CERTIFICATION
 SCHEDULE**

1 The Parties to the above-entitled action, through their respective counsel of record, submit
2 this Stipulation and Proposed Order to re-set Plaintiff's deadline to file a motion for class
3 certification. The deadline to move for class certification is presently March 30, 2017. Plaintiffs
4 seek to re-set this deadline to June 30, 2017. There is good cause for modifying the existing
5 deadline, and the need to do so is no fault of either party.

6 The Parties have diligently pursued discovery in this matter. Defendants are in the process
7 of producing class member records which Plaintiffs have requested in connection with their
8 anticipated motion to certify a class pursuant to Rule 23 of the Federal Rules of Civil Procedure,
9 and motion to certify an opt-in class under the Fair Labor Standards Act. Defendants are providing
10 and updated class list, electronic payroll data, and additional payroll information. The Parties
11 continue to meet and confer with regard to production of electronic time records. Once records are
12 produced, Plaintiffs anticipate deposing the person most qualified for each Defendant on relevant
13 labor policies, and Plaintiffs position is that the deposition should occur after production of records.
14 Plaintiffs believe that both the production of records and depositions are necessary for certification.
15 Further, Plaintiffs intend to present data analysis for class certification. The expert has begun to
16 receive data that Defendants have produced in the last couple of weeks and additional data will be
17 provided as it is produced. The expert will require time to prepare his analysis for certification
18 purposes.

19 Based on the foregoing, the Parties have agreed to request that the Court continue the
20 deadline for Plaintiffs to file a Motion for Class Certification to June 30, 2017, and to establish the
21 following briefing schedule:

22 Opposition: July 27, 2017

23 Reply: August 18, 2017

24 Hearing: September 8, 2017

25 Respectfully submitted,

26 DATED: March 17, 2017

MALLISON & MARTINEZ

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By: /S/ Marco A. Palau

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Marco A. Palau
Attorneys for PLAINTIFFS
Marco A. Palau
Attorneys for PLAINTIFFS

SHOOK HARDY & BACON L.L.P.

DATED: March 17, 2017

By: /S/ Carrie A. McAtee
William C. Martucci*
Carrie A. McAtee*
2555 Grand Blvd.
Kansas City, Missouri 64108
Telephone: 816-474-6550
Facsimile: 816-421-5547
Email: wmartucci@shb.com
cmcatee@shb.com
*admitted *pro hac vice*

Tammy B. Webb (SBN: 227593)
One Montgomery, Suite 2700
San Francisco, California 94104-2828
Telephone: 415-544-1900
Facsimile: 415-391-0281
Email: tbwebb@shb.com

*Attorneys for Defendants
Leggett & Platt, Incorporated
and L&P Financial Services Co*

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ORDER (AS MODIFIED BY THE COURT)

For good cause appearing, the deadline for Plaintiff to file a motion for class certification under Federal Rule of Civil Procedure Rule 23, and a motion to certify a collective action under the Fair Labor Standards Act, is hereby continued to June 30, 2017.

Opposition: July 27, 2017
Reply: August 18, 2017
Hearing: September 19, 2017 at 1:30 p.m.

IT IS SO ORDERED.

Dated: 3/17/2017 /s/ John A. Mendez
U. S. District Court Judge John A. Mendez